

CAUSE NO. 97-00933-I

TRACY NEFF,
Plaintiff

vs.

LANDMARK EDUCATION
CORPORATION AND DAVID GRILL,
AN INDIVIDUAL,
Defendants

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

162nd JUDICIAL DISTRICT

EXHIBIT "A"

**INDEX OF EVIDENCE IN SUPPORT OF PLAINTIFF'S RESPONSE TO
LANDMARK'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES Plaintiff Tracy Neff, and files this Index of Evidence in Support of Plaintiff's Response to Defendant Landmark Education Corporation's Motion for Summary Judgment. The evidence attached hereto is relied upon and incorporated in Plaintiff's Response as if copied verbatim.

- 1.) Exh. "A-1"—Personnel file of David Grill. The documents attached as Exh. "A-1" have been stipulated as business records of Defendant Landmark Education Corporation. See, Dillon depo at p. 176-177.
- 2.) Exh. "A-2"—Pamphlets about the Landmark Forum. The documents attached as Exh. "2" are propounded by Landmark, with the intent that persons who are interested in taking the Forum may rely on the information contained therein. See, Dillon depo at p. 210-211.
- 3.) Exh. "A-3"—Affidavit of Joel Brockner, Ph.D.
- 4.) Exh. "A-4"—Affidavit of Rick Ross.
- 5.) Exh. "A-5"—Police record of Dallas Police Department, under deposition on written questions of Peggy C. Ross.
- 6.) Exh. "A-6"—Records of Parkland Memorial Hospital.
- 7.) Exh. "A-7"—Records of Dr. James Godat, M.D., under the business records affidavit of Joseph L. Godat, Jr., M.D.
- 8.) Exh. "A-8"—Certified Copies of Court Records in the Case styled *State v. David Grill*, Cause No. F-95-02599-W in the 363rd Criminal District Court of Dallas County, Texas.

**EXHIBIT "A" INDEX OF EVIDENCE IN SUPPORT OF PLAINTIFF'S RESPONSE TO LANDMARK'S
MOTION FOR SUMMARY JUDGMENT** - Page 1

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- 9.) Exh. "A-9"—Exerpts from the Oral Deposition of David Grill.
- 10.) Exh. "A-10"—Exerpts from the Oral Deposition of Tracy Neff.
- 11.) Exh. "A-11"—Exerpts from the Oral Deposition of Arthur Schreiber.
- 12.) Exh. "A-12"—Exerpts from the Oral Deposition of Patricia Dillon.
- 13.) Exh. "A-13"—Exerpts from the Oral Deposition of Robin Adelson.
- 14.) Exh. "A-14"—Exerpts from the Oral Deposition of Mindie Dodson.
- 15.) Exh. "A-15"—Tracy Neff's Application to the Landmark Forum.
- 16.) Exh. "A-16"—Affidavit of Tracy Neff.